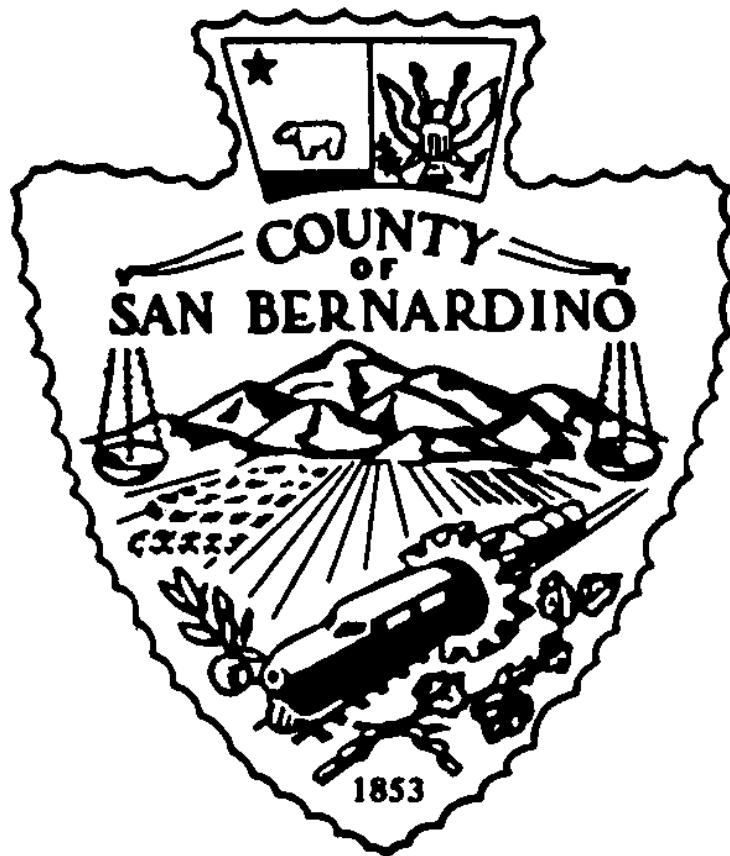


Hazard Communication



HAZARD COMMUNICATION PROGRAM

SCOPE

This establishes County of San Bernardino procedure for hazard communication. It provides information and guidance on the process of identifying hazardous materials/substances used in the workplace during the course of employment. The program identifies documentation, communication, training, and medical surveillance following exposure necessary to ensure the health and safety of County employees. **This procedure sets forth minimum standards for all County departments.** Individual departments may implement more stringent standards. Copies of department prepared programs are to be provided to Risk Management Division/ Safety Section upon request, as well as included in the immediately following divider labeled "Department Program".

PURPOSE

Title 8, California Code of Regulations, General Industry Safety Orders, Section 5194 requires employers to establish a Written Hazard Communication Program including procedures for employee training, hazard identification, labeling, records maintenance, and medical surveillance.

INTRODUCTION

Substance/material identified as being hazardous exists in many work places within the County of San Bernardino. Regulations require employers to prepare and implement a **written** Hazard Communication Program. Within the following guidelines, individual County departments shall prepare department specific written programs.

IDENTIFYING PRODUCTS AND CHEMICALS

At each work location, an inventory shall be prepared to include all products, materials, and chemicals used in the workplace. All containers found in work areas are to be included in the inventory.

The identification process involves preparing an inventory for each product, chemical and substance at all locations within the county. Unidentified products/substances in unmarked containers are to be disposed of during the inventory process according to hazardous material disposal requirements established by the County Department of Environmental Health Services.

In addition, an inventory form must be prepared identifying the location of and product contained by each pipe in the workplace.

HAZARD EXEMPTIONS

The Hazard Communication Program does not apply to:

1. Consumer products packaged for distribution to and use by the general public, unless employee exposure is greater than exposure to the ordinary customer.
2. Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and recovery Act.
3. Tobacco or tobacco products.
4. Wood or wood products (non-excluded hazardous substances which are used in conjunction with wood or wood products, or are known to be present as impurities in those materials).
5. Articles (hazardous substances used in the manufacture or use of an article covered unless otherwise excluded).
6. Foods, drugs, or cosmetics intended for personal consumption or use while employees are in the workplace.
7. Retail food sale establishments and all other retail trade establishments, except for processing and repair work areas.

8. The use of a substance in compliance with regulation of the Director of Food and Agriculture issued pursuant to Section 12981 of the Food and Agricultural Code.

Proposition 65 Warnings: The County is exempt from Health and Safety Code Section 25249.11 (a) and (b), Safe Drinking Water and Toxic Enforcement Act 1986.

MATERIAL SAFETY DATA SHEETS (MSDS)

Manufacturers are required to provide an MSDS for each chemical and substance produced. The MSDS is a fact sheet summarizing basic information about a substance and detailing the hazard potential.

An MSDS is to be obtained from the manufacturer or supplier for each hazardous substance employees' use or may be exposed to in the workplace. New or revised MSDS's will be reviewed with all affected employees within 30 days of receipt of the MSDS.

An MSDS should be requested from the supplier prior to the purchase of unusual or extraordinary products. Risk Management Division/ Safety Section shall be consulted before using any product posing extraordinary hazards or subject to extensive regulation. **Consultation with the Occupational Health Officer and Risk Management Division/Safety Section is mandatory prior to the purchase or use of any product or substance containing a known carcinogen.**

TRADE SECRETS

Manufacturers or importers may withhold the specific identity of a chemical if they are protecting a bona fide trade secret and have notified the Director of the Department of Industrial Relations. All sections of an MSDS except the specific chemical identity must be completed by such manufacturer. As a general rule, County Departments are to avoid using products containing substances which the manufacturer will not identify.

Manufacturers or importers must release the actual chemical identity to health and safety professionals under both emergency and

non-emergency conditions. The rules in the General Industry Safety Orders, Section 3204(f) in Title 8 of the California Administrative Code provide specific conditions for trade secret release and for holding the information confidential.

HAZARD DETERMINATION

The hazard potential of each inventoried item is to be determined by information provided on the MSDS. Risk Management Division/ Safety Section may consult on questions relative to the potential hazard of a product.

The nature of the physical hazard posed by each product is to be identified as follows:

- Combustible Liquid
- Pyrophoric
- Explosive
- Oxidizer
- Compressed Gas
- Unstable or
- Flammable
- Water Reactive
- Organic Peroxide

Chemicals posing health hazards are to be identified as follows:

- Carcinogenic
- Toxic Agent
- Corrosive
- Irritant
- Sensitizer
- Reproductive Agent

MSDS's must be obtained for any product evaluated as a **HEALTH** or **PHYSICAL HAZARD** or both. These health and physical hazards should be covered in employee training sessions using information from the MSDS.

LABELING

All containers containing highly toxic, corrosive, flammable, oxidizing, pyrophoric, or any other hazardous substances will be labeled, tagged, or marked with the identity of the hazardous substance(s), appropriate hazard warning, personal protective equipment to be used when working with the contents, and the name and address of the manufacturer, importer, or other responsible party.

Within the County of San Bernardino, formal labels shall be prepared for all secondary containers of hazardous products/chemicals. Secondary containers are defined as any product container other than that in which the product was purchased. Portable and on-site stationary containers are classified as secondary containers. **The use of any food or drink container as a secondary container, even temporarily, is strictly prohibited.** Label making materials are available through Central Stores and are to be used in identifying all secondary containers.

LABELING EXEMPTIONS

Title 8, Section 5194 does not require additional labeling of the following substances:

1. Any pesticide, as such term is defined in the Federal Insecticide, Fungicide, and Rodenticide Act, when subject to labeling requirements of that Act and labeling regulations issued under the Act by the Environmental Protection Agency.
2. Any food, food additive, color additive, drug or cosmetic, including materials intended for use as ingredients (e.g., flavors and fragrances) in such products, as such terms are defined in the Federal Food, Drug and Cosmetic Act.
3. Any distilled spirits (beverage alcohols), wine, or malt beverage intended for non-industrial use.
4. Any consumer product or hazardous substance as those terms are defined in the Consumer Product Act and Federal Hazardous Substances Act.

TRAINING

Hazard training and information is to be provided to all employees about hazardous substances in the work area at the time of initial assignment and whenever a new hazard is introduced into the work area. Employees from other locations temporarily

working in a supervisor's area of responsibility are to be provided a hazard orientation by the area supervisor prior to any work activities.

Work location specific training is to be developed by department management and is to include as a minimum:

1. Review of Hazard Communication Program, including an explanation of the labeling system, what they are and how to use material safety data sheets, and how employees can obtain and use the appropriate hazard information.
2. Identification of all hazardous material in the workplace.
3. Instruction about measures employees can take to protect themselves from hazards in the workplace, including specific procedures the department has implemented, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
4. Methods and observations that may be used to detect the presence or release of a hazardous substance in the work area (such as monitoring devices, exposures, symptoms, etc.).
5. Hazard spill response, clean up, and disposal.
6. Medical Surveillance.
7. Location of MSDS'.
8. Training documentation shall include a class roster, a copy of the program outline, samples of handouts, copies of tests, the training date, and name of instructor.

MEDICAL MANAGEMENT

Risk Management/Safety Section and the Occupational Health Division will ensure that all medical guidelines mandated by Title 8,

California Code of Regulations, General Industry Safety Orders are implemented for those employees exposed to action levels of hazardous materials/substances.

Risk Management/Safety Section shall be responsible to ensure that appropriate monitoring/testing is completed for the purposes of determining exposure levels. The need for monitoring will be established by department request.

safety/docs/sftymnl/hazcom1.doc

EXAMPLE MSDS REQUEST LETTER

County of San Bernardino

Chemical Company or Distributor
(Street Address or P.O. Box
(City, State, Zip Code)

(Date)

RE: MSDS FOR (Products/Chemicals)

Please send a copy of your Materials Safety Data Sheet (MSDS) for the above product(s). The MSDS is needed for compliance with the State of California Hazard Communication Standard, Section 5194 of Title 8, California Code of Regulations.

Please send the MSDS to:

(Department Name)
(Street Address)
(City, State, Zip Code)
(Attn: Supervisor)

If you have any questions concerning this request, please contact _____
at () _____

Sincerely,

(Name of County Representative)
(Title)

cc: Safety Officer, Risk Management Division

EMPLOYEE TRAINING CHECKLIST

County of San Bernardino

(This report is to be completed by the Supervisor and New Employee within five working days of employment or new job assignment. Additional forms are to be prepared as the employee receives safety training during the course of employment, at least annually).

NAME _____ BIRTH DATE _____

Date Employed: _____ SSN: _____ Department Assigned: _____

Job Title: _____ Employee Past Work Experience: _____

- A. Has Employee taken pre-employment physical? ☐ yes ☐ no
B. Are there any physical limitations? ☐ yes ☐ no

If answer to B is yes, please explain:

I HAVE BEEN INSTRUCTED IN THE FOLLOWING SUBJECTS THAT ARE CHECKED:

1. Safety policies and programs ☐ yes ☐ no
2. Safety rules, both general and specific to the job assignment ☐ yes ☐ no
3. Safety rule enforcement procedures ☐ yes ☐ no
4. Use of tools and equipment ☐ yes ☐ no
5. Proper work shoes and other personal protective equipment ☐ yes ☐ no
6. Handling of material ☐ yes ☐ no
7. Lifting and use of lifting equipment such as hoists and cranes ☐ yes ☐ no
8. How, when and where to report injuries ☐ yes ☐ no
9. Importance of housekeeping ☐ yes ☐ no
10. Special hazards of job ☐ yes ☐ no
11. When and where to report unsafe conditions ☐ yes ☐ no
12. Safe operation of vehicle ☐ yes ☐ no

13. Personal protective equipment: List items _____

14. Hazardous materials: List items _____

15. Tools/Equipment: List items _____

16. List all training not indicated above (use back of form if necessary: _____

Employee Signature _____ Date _____

Follow up on employee will be observed by _____

Employee has performed operation to the satisfaction of the undersigned. An observation was completed on the date indicated.

Supervisor Signature _____ Date _____

IMPORTANT: If employee is transferred to another job, an additional safety instruction report must be completed.

WRITTEN HAZARD COMMUNICATION PROGRAM EXAMPLE

Each San Bernardino County department must prepare and implement a written Hazard Communication Program. This is a sample format, which may be used by those departments that have not prepared a more extensive written program. You may obtain your copy of this written program through E-mail by contacting San Bernardino County Risk Management Division, Safety Section.

INTRODUCTION

(*Department*) has developed the following Hazard Communication Program to fulfill the commitment of maintaining a healthful work environment for County of San Bernardino employees.

This program provides information about chemicals and other hazardous products, control of hazards, Material Safety Data Sheets (MSDS), container labeling, and employee information and training.

MATERIAL SAFETY DATA SHEETS (MSDS)

Copies of MSDS for all hazardous substances to which employees may be exposed are maintained at (*location*). (*Position/Person*) will be responsible for obtaining and maintaining MSDS records for (*Department*).

(*Position/Person*) will review all incoming MSDS for new and significant health/safety information. (*Name*) will see that all new information is brought to the attention of affected employees. (*Position/Person*) will ensure that no new hazardous substance is used in the (*Department*) until an MSDS has been obtained for the product and employee training completed.

(*Position/Person*) will review the MSDS for completeness. If an MSDS is incomplete or insufficient, a new MSDS will be requested from the manufacturer.

MSDS's are available to all employees at their work location for review during each work shift. If MSDS's are not available or new hazardous substances in use do not have an MSDS, please contact (*Position/Person*) immediately.

CONTAINER LABELING

It is the policy of (*Department*) that no container of hazardous substances will be released for use until the following label information is verified:

1. Containers are clearly labeled as to contents.
2. Appropriate hazard warnings are noted.
3. The name and address of the manufacturer are listed.

The responsibility for appropriate labels has been assigned to (*Name of Person/Position*).

To further ensure employees are aware about hazards of materials used in work areas, it is our policy to label all secondary containers. (*Position/Person*) will ensure that all secondary containers are labeled with either an extra copy the original manufacturer's label or with generic labels designed for the purpose of labeling secondary containers.

EMPLOYEE INFORMATION AND TRAINING

Newly hired employees are to attend an orientation scheduled by (*Position/Person*) and receive training on the following subjects:

1. Requirements contained in the Hazard Communication Program.
2. Identification of all operations in the work area where hazardous substances are present.
3. Location and availability of the written Hazard Communication Program.
4. Physical and health effects of hazardous substances in the work area.
5. Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.

6. Methods to minimize or prevent exposure to hazardous substances through safe work practices and use of Personal Protective Equipment (PPE).
7. Precautions taken by (*Department*) to minimize or prevent exposure to hazardous substances.
8. Emergency and first aid procedures relative to hazardous substance exposure.
9. How to read labels and review MSDS to obtain appropriate hazard information.
10. Hazardous spill response, clean up, and disposal.

It is important that employees understand all information and training. Questions are to be referred to (*Position/Person*).

Whenever a new hazardous substance is introduced into a work area, (*Supervisory Position/Person*) will review items 1 - 10 above as they relate to the new material with all affected employees.

Employees are prohibited from using any hazardous material unless trained as follows:

1. Nature of Hazard
2. Personal Protective Equipment
3. Exposure First Aid
4. Safe Work Practices
5. Spill Response, Clean Up and Disposal

LIST OF HAZARDOUS SUBSTANCES

As MSDS records are obtained, a list of all hazardous substances at (*Department*) will be prepared and included as a part of this program. The location of each substance will be identified on this list.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform non-routine tasks using hazardous substances. Prior to starting work on such projects, each affected employee will be given information by their supervisor about hazards to which they may be exposed during the activity. This information will include:

1. Specific hazards.
2. Protective/safety measures which must be used.
3. Measures the (*Department*) has taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.

A list of non-routine tasks with the potential of hazardous exposure shall be prepared by (*Position*) and posted at (*Location*) for the information of employees.

All questions about this program should be directed to (*Position/Person*). This program will be monitored by (*Position/Person*) and Risk Management Division/ Safety Section to ensure that policies are carried out and that the program is effective.